

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**NOTICE OF EIGHTH APPLICATION OF STINSON LLP FOR  
ALLOWANCE OF FEES AND EXPENSES AS COUNSEL  
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FROM MARCH 1, 2025 THROUGH MARCH 31, 2025**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

1. **NOTICE IS HEREBY GIVEN** that Stinson LLP, as counsel for the Official Committee of Unsecured Creditors, has filed its eighth application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **May 23, 2025, which is twenty-one (21) days from the date of the filing of this Notice, excluding holidays**. Any objections not filed and served may deemed waived.

Dated: May 2, 2025

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)

Christopher J. Harayda (MN #0390333)

Samantha J. Hanson-Lenn (MN #0402035)

**STINSON LLP**

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**COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS.**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

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Chapter 11

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**EIGHTH APPLICATION OF STINSON LLP FOR ALLOWANCE OF FEES AND  
EXPENSES AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FROM MARCH 1, 2025, THROUGH MARCH 31, 2025**

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1. Stinson LLP ("Stinson") makes this Eighth Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as counsel for the Official Committee of Unsecured Creditors (the "Committee") of EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the "Debtors") pursuant to 11 U.S.C. § 330.

2. In support of this Application, Stinson respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the "Petition Date"). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, 331, and 1103. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application

is provided pursuant to the Federal Rules of Bankruptcy Procedure, the Notice and Service Requirements adopted pursuant to Local R. 2002-1, and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

### **BACKGROUND**

5. On July 30, 2024, the Office of the United States Trustee appointed the Committee. [Dkt. No. 58.]

6. On August 7, 2024, the Committee selected Stinson to serve as its bankruptcy counsel, subject to court approval. On August 13, 2024, the Committee filed the Application to Employ Stinson LLP as Counsel to the Official Committee of Unsecured Creditors (the "Application to Employ"). [Dkt. No. 69.] The Court granted the Application to Employ, effective August 7, 2024, on August 30, 2024, via docket text (the "Order Approving Application to Employ"). [Dkt. No. 101.] A copy of the Order Approving Application to Employ is attached as **Exhibit A**.

7. Pursuant to the Order Approving the Application to Employ, the Court also granted Stinson the authority to apply for fees and expenses pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals at Dkt. No. 72 (the "Order Establishing Fee Application Procedures"). The Order Establishing Fee Application Procedures is attached as **Exhibit B**.

8. This is Stinson's eighth application for compensation under 11 U.S.C. § 331. Stinson's filed its first application on September 16, 2024 (the "First Application"); its second application on November 7, 2024 (the "Second Application"); its third application on December 2, 2024 (the "Third Application"); its fourth application on December 30, 2024 (the "Fourth Application"); its fifth application on February 6, 2025 (the "Fifth Application"); its sixth

application on February 25, 2025 (the “Sixth Application”); and its seventh application on April 4, 2025 (the “Seventh Application”). [Dkt. Nos. 109, 160, 179, 202, 219, 237, and 265.] The Court has approved the First, Second, Third, Fourth, Fifth, and Sixth Applications as follows: 1) for the First Application, the Court approved \$42,776.50 in fees and \$1,953.04 in expenses for a total of \$44,729.54 on October 21, 2024; 2) for the Second Application, the Court approved \$40,957.50 in fees and \$2,661.88 in expenses for a total of \$43,619.38 on December 4, 2024; 3) for the Third Application, the Court approved \$11,882.00 in fees on December 27, 2024; 4) for the Fourth Application, the Court approved \$16,105.50 in fees on January 27, 2025; 5) for the Fifth Application, the Court approved \$6,188.50 in fees on March 4, 2025; 6) for the Sixth Application, the Court approved \$18,631.50 in fees on March 25, 2025. [Dkt. Nos. 149, 181, 201, 217, 239, and 264.]

### **RELIEF REQUESTED**

1. **Fees and Expenses.** By this Application, Stinson requests allowance of fees for professional services rendered during Debtors' Chapter 11 cases between March 1, 2025, to March 31, 2025, in the amount of **\$19,036.50**, and reimbursement of expenses in the amount of **\$570.25**, for a total of **\$19,606.75**.

2. The professional services rendered by Stinson are detailed on the attached **Exhibit**

**C.** Those services include the tasks specifically described below:

**(Task Code: B100 and B110) Case Administration: \$968.00**

Services include reviewing and analyzing court filings including the monthly operating reports, and preparing exhibits and finalizing filings with the court, including ensuring all court orders and local rules are followed.

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Year</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Fees</u></b>
Benjamin J. Court	0.2	2025	\$565	\$113.00
Christopher J. Harayda	0.9	2025	\$565	\$508.50
Miranda Swift	0.9	2025	\$445	\$346.50

<b>TOTAL</b>	<b>2.0</b>			<b>\$968.00</b>
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Blended Hourly Rate:	\$484.00
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**(Task Code: B120) Asset Analysis and Recovery: \$1,159.00**

Services include communicating with the CRO and Debtors' counsel to address ongoing litigation, settlement discussions, and strategies of recovery; preparing for and communicating with the Committee about the status of negotiations, ongoing litigations, potential settlement offers, and mediation; analyzing issues regarding recovery options on certain projects and evaluating summaries of the same; analyzing filed adversary proceedings.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	0.5	2025	\$565	\$282.50
Christopher J. Harayda	1.1	2025	\$565	\$621.50
Samantha J. Hanson-Lenn	0.4	2025	\$445	\$178.00
Miranda Swift	0.2	2025	\$385	\$77.00
<b>TOTAL</b>	<b>2.2</b>			<b>\$1,159.00</b>

Blended Hourly Rate:	\$526.82
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**(Task Code B150) Meetings of and Communications with Creditors: \$3,829.50**

Services include participating in various conferences with the Committee to evaluate and provide advice regarding mediation and Debtors' recovery options, settlements, and status updates; reviewing and responding to various questions from creditors regarding claims trading; engaging in various communications via email and phone with creditors regarding the status of case, bankruptcy process, and new filings in the case.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	1.6	2025	\$565	\$904.00
Christopher J. Harayda	2.8	2025	\$565	\$1,582.00
Samantha Hanson-Lenn	2.5	2025	\$445	\$1,112.50
Miranda S. Swift	0.6	2025	\$385	\$231.00
<b>TOTAL</b>	<b>7.5</b>			<b>\$3,829.50</b>

Blended Hourly Rate:	\$510.60
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**(B160 and 170) Employment Applications and Fee Applications: \$509.50**

Services include preparing Fee Applications and evaluating issues regarding Fee Applications.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Shelby E. Kostolni	0.9	2025	\$395	\$355.50
Miranda S. Swift	0.4	2025	\$385	\$154.00
<b>TOTAL</b>	<b>1.3</b>			<b>\$509.50</b>

Blended Hourly Rate:	\$391.92
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**(B190) Other Contested Matters: \$8,429.50**

Services include reviewing updated pleadings in adversary proceeding and analyzing issues regarding defenses in adversary proceedings; attending status conferences for various adversary proceedings; preparing summary of adversary proceedings and settlements for Committee; preparing for and participating in mediation.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Christopher J. Harayda	14.5	2025	\$565	\$8,192.50
Shelby E. Kostolni	0.6	2025	\$395	\$237.00
<b>TOTAL</b>	<b>15.1</b>			<b>\$8,429.50</b>

Blended Hourly Rate:	\$558.25
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**(B320) Plan/Disclosure Statement Incl. Bus Plan: \$4,141.00**

Services include reviewing the Debtors' drafted plan of reorganization and update the Committee.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Andrew Glasnovich	3.7	2025	\$565	\$2,090.50
Christopher J. Harayda	3.0	2025	\$565	\$1,695.00
Shelby E. Kostolni	0.9	2025	\$395	\$355.50
<b>TOTAL</b>	<b>7.6</b>			<b>\$4,141.00</b>

Blended Hourly Rate:	\$544.87
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**TOTAL FEES: \$19,036.50**

3. **Reimbursement of Expenses.** In the course of this representation, Stinson has also incurred expenses detailed in **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Hotel Room for Mediation Attendance	\$207.85
Mileage for Mediation Attendance	\$330.40
Parking for Mediation Attendance	\$32.00
<b>TOTAL</b>	<b>\$570.25</b>

**TOTAL EXPENSES: \$570.25**

4. All services for which fees are requested by Stinson were performed for and on behalf of the Committee, and not on behalf of the Debtors or other persons.

**LEGAL BASIS**

5. This Court is authorized to award to professional persons employed by section 1103 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered by the ... attorney[s] and by any paraprofessional person[s] employed by any such person, and ... reimbursement for actual, necessary expenses.” 11 U.S.C. § 330. The Court must consider the nature, extent, and value of such services, taking into account all relevant factors to determine whether the request for payment in connection with such services is fair and reasonable. *Id.* The services Stinson provided pursuant to this Eighth Application were actual, reasonable, and necessary services on behalf of the Committee, and not on the behalf of any other persons, and the fees and expenses requested in this Application are fair and reasonable under the circumstances of this case.

**WHEREFORE**, Stinson respectfully requests that the Court enter an order:

A. Allowing Stinson’s fees incurred between March 1, 2025, and March 31, 2025, in the amount of **\$19,036.50**, and reimbursement of expenses in the amount of **\$570.25**, for a total of **\$19,606.75**.

B. Authorizing and directing the Debtors to pay Stinson such allowed fees and expenses;



- C. Granting administrative expense priority to Stinson's allowed fees and expenses;  
and
- D. Granting such other and further relief as may be just and proper.

Dated: May 2, 2025

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)  
Christopher J. Harayda (MN #0390333)  
Samantha J. Hanson-Lenn (MN #0402035)  
**STINSON LLP**  
50 South Sixth Street, Suite 2600  
Minneapolis, Minnesota 55402  
Telephone: 612-335-1500  
benjamin.court@stinson.com  
cj.harayda@stinson.com  
samantha.hansonlenn@stinson.com

**COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS.**

**AFFIDAVIT**

I, Benjamin J. Court, an attorney at the law firm of Stinson LLP, declare under penalty of perjury that the foregoing Eighth Application of Stinson LLP for Allowance of Fees and Expenses as counsel for the Official Committee of Unsecured Creditors from March 1, 2025, through March 31, 2025, is true and correct according to the best of my knowledge, information, and belief.

Dated: May 2, 2025

/s/Benjamin J. Court  
Benjamin J. Court

## **EXHIBIT A**

**Docket Text:**

Order Approving Application to Employ Benjamin J. Court and Stinson LLP as counsel for the Official Committee of Unsecured Creditors Effective August 7, 2024 (Related Doc # [69]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. §§ 329, 330. Applicant must also comply with Local Rules. Applicant is also granted authority to apply for fees and expenses pursuant to #[72] Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 08/30/2024 (vck)

## **EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
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Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT

## **EXHIBIT C**





1201 Walnut Street, Suite 2900  
Kansas City, MO 64106-2150  
1.800.846.1201

April 21, 2025

The Official Committee of Unsecured Creditors for  
EPIC Companies  
Attn The Official Committee of Unsecured Creditors  
NA

Invoice No: 43630014  
Benjamin Court

Re: EPIC Companies Midwest, LLC

File No: 3531668.0002

### Invoice Summary

Professional services and disbursements rendered through March 31, 2025

Current Professional Services	\$19,036.50
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Current Disbursements	\$570.25
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<b>Total Current Invoice</b>	<b>\$19,606.75</b>
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Payment Terms: Net 30

Tax ID #44-0643135

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43630014

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Andrew Glasnovich	Partner	565.00	3.70	2,090.50
Benjamin Court	Partner	565.00	2.30	1,299.50
C.J. Harayda	Partner	565.00	22.30	12,599.50
Miranda Swift	Associate	385.00	2.10	808.50
Miranda Swift	Associate		0.10	No Charge
Samantha Hanson-Lenn	Associate	445.00	2.90	1,290.50
Shelby Kostolni	Associate	395.00	2.40	948.00
Shelby Kostolni	Associate		0.20	No Charge
<b>Current Professional Services</b>			<b>36.00</b>	<b>\$19,036.50</b>

**Professional Services**

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>B110 - Case Administration</b>				
03/04/25	B110	Exchange emails regarding mediation timing and issues. Benjamin Court	0.20	113.00
03/04/25	B110	Review and analyze issues regarding Committee membership changes and communications regarding same (.4); review updates from P. Finn (.3). C.J. Harayda	0.70	395.50
03/10/25	B110	Review entries of additional adversary proceedings (.1); communication with Z. Frappier regarding mediation (.1). C.J. Harayda	0.20	113.00
03/19/25	B110	Review and prepare summary of Debtors' monthly operating reports. Miranda Swift	0.90	346.50
<b>Total B110 - Case Administration</b>			<b>2.00</b>	<b>968.00</b>
<b>B120 - Asset Analysis and Recovery</b>				
03/03/25	B120	Review adversary proceeding against 36th and Veterans	0.10	44.50

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43630014

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		and analysis regarding potential recovery in preparation for hearing. Samantha Hanson-Lenn		
03/04/25	B120	Prepare for and attend conference with Mediator in 5 adversary proceedings (1.0); communications regarding new complaints (.1). C.J. Harayda	1.10	621.50
03/04/25	B120	Attend adversary proceeding hearing against 36th and Veterans. Samantha Hanson-Lenn	0.30	133.50
03/20/25	B120	Review and analyze mediation notes and evaluate options to address recovery on multiple projects. Benjamin Court	0.50	282.50
03/20/25	B120	Discussions regarding Debtors' analysis of adversary proceedings. Miranda Swift	0.20	77.00
<b>Total B120 - Asset Analysis and Recovery</b>			<b>2.20</b>	<b>1,159.00</b>
<b>B150 - Meetings of and Comm. with Creditors</b>				
03/03/25	B150	Address and evaluate Committee composition and potential Committee member issues. Benjamin Court	0.20	113.00
03/03/25	B150	Communications regarding Committee membership and replacement. C.J. Harayda	0.20	113.00
03/04/25	B150	Exchange emails with various creditors regarding case updates, proposed next steps, and recovery issues (.3); review and analyze communications and pleadings regarding creditor Committee composition and appointment issues (.4). Benjamin Court	0.70	395.50
03/05/25	B150	Exchange emails with unsecured creditor regarding recovery issues and questions regarding sale of claims. Benjamin Court	0.30	169.50
03/05/25	B150	Review proposed responses to creditor inquiries. C.J. Harayda	0.10	56.50

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43630014

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
03/05/25	B150	Review and analyze email from creditor J. Merrill regarding questions on claims buyer (.1); review docket to determine whether claims have been acquired (.2); prepare response regarding the same (.2). Samantha Hanson-Lenn	0.50	222.50
03/06/25	B150	Exchange email with creditor regarding claim sale questions and plan confirmation issues. Benjamin Court	0.20	113.00
03/07/25	B150	Review and analyze new complaint and possible recovery (.3); prepare correspondence to Committee regarding the same (.2). Samantha Hanson-Lenn	0.50	222.50
03/11/25	B150	Communications with Committee regarding mediation and need for input regarding settlement proposals. C.J. Harayda	0.10	56.50
03/11/25	B150	Review and draft correspondence with creditor regarding adversary proceedings. Miranda Swift	0.60	231.00
03/11/25	B150	Evaluate eight new adversary proceedings filed and prepare correspondence to Committee regarding same. Samantha Hanson-Lenn	1.40	623.00
03/12/25	B150	Exchange emails with creditor regarding note holder questions and plan issues. Benjamin Court	0.20	113.00
03/12/25	B150	Review and analyze responses to receiver questions. C.J. Harayda	0.20	113.00
03/12/25	B150	Review correspondence from creditor Merrill regarding questions about unsecured creditors and prepare communication to B. Court regarding same. Samantha Hanson-Lenn	0.10	44.50
03/18/25	B150	Draft email to Committee with updates on multiple topics including plan, mediation and litigation. C.J. Harayda	0.60	339.00
03/19/25	B150	Communications with Committee regarding mediation proposals and analysis. C.J. Harayda	0.80	452.00
03/20/25	B150	Draft and revise update to Committee regarding mediation and related issues.	0.80	452.00

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43630014

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		C.J. Harayda		
<b>Total B150 - Meetings of and Comm. with Creditors</b>			<b>7.50</b>	<b>3,829.50</b>
<b>B160 - Fee/Employment Applications</b>				
03/17/25	B160	Review of February 2025 invoice. Miranda Swift	0.10	No Charge
03/18/25	B160	Continued edits to fee application and discussions regarding same. Miranda Swift	0.40	154.00
03/19/25	B160	Draft February 2025 fee application. Shelby Kostolni	0.30	118.50
03/20/25	B160	Draft February 2025 fee application and review invoices for the same. Shelby Kostolni	0.60	237.00
<b>Total B160 - Fee/Employment Applications</b>			<b>1.40</b>	<b>509.50</b>
<b>B190 - Other Contested Matters</b>				
03/03/25	B190	Review and respond to updates regarding mediation (.2); communications with debtors counsel regarding mediation and additional negotiations (.1). C.J. Harayda	0.30	169.50
03/12/25	B190	Review mediation logistics. C.J. Harayda	0.20	113.00
03/18/25	B190	Prepare for mediation and travel to Fargo (4.0); meeting with S. Kinsella, K. Nixon, and P. Finn regarding mediation and plan terms (1.0). C.J. Harayda	5.00	2,825.00
03/19/25	B190	Review mediation statements and prepare summary of pre-mediation proposals (.8); attend and participate in mediation and transit (7.5). C.J. Harayda	8.30	4,689.50
03/20/25	B190	Analyze issues regarding investor holdings in project	0.70	395.50

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43630014

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		companies (.3): communications with P. Finn regarding same (.2); review project analysis for certain projects in litigation (.2). C.J. Harayda		
03/20/25	B190	Review and summarize the circulated draft of consolidation motion. Shelby Kostolni	0.60	237.00
<b>Total B190 - Other Contested Matters</b>			<b>15.10</b>	<b>8,429.50</b>
<b>B320 - Plan/Disclosure Statement Incl. Bus Plan</b>				
03/12/25	B320	Communications with debtors counsel regarding various issues including plan and mediation. C.J. Harayda	0.40	226.00
03/17/25	B320	Review and analyze draft plan of reorganization from debtors. C.J. Harayda	1.30	734.50
03/18/25	B320	Telephone conference with C.J. Harayda regarding drafted plan and consolidation motion. Shelby Kostolni	0.20	No Charge
03/18/25	B320	Review and summarize drafted plan circulated by Debtors. Shelby Kostolni	0.90	355.50
03/19/25	B320	Analyze plan and draft sub con motion and provide edits and comments regarding proposed changes to same. Andrew Glasnovich	3.70	2,090.50
03/29/25	B320	Review proposed plan of liquidation (.6); draft update to Committee regarding plan and related issues (.6); communications with S. Kinsella regarding plan (.1). C.J. Harayda	1.30	734.50
<b>Total B320 - Plan/Disclosure Statement Incl. Bus Plan</b>			<b>7.80</b>	<b>4,141.00</b>
<b>Current Professional Services</b>			<b>36.00</b>	<b>\$19,036.50</b>

Stinson LLP

Invoice Detail

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### Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	2.00	968.00
B120	Asset Analysis and Recovery	2.20	1,159.00
B150	Meetings of and Comm. with Creditors	7.50	3,829.50
B160	Fee/Employment Applications	1.40	509.50
B190	Other Contested Matters	15.10	8,429.50
B320	Plan/Disclosure Statement Incl. Bus Plan	7.80	4,141.00
Current Professional Services		36.00	\$19,036.50

### Disbursements

Date	Description	Amount
03/19/25	Hotel - Lodging on 03/18/2025 - 03/19/2025 for attendance at mediation	207.85
03/19/25	Parking for attendance at mediation	6.00
03/19/25	Mileage for C.J. Harayda for travel for hotel stay for attendance at mediation ^472.00 miles	330.40
03/19/25	Parking for attendance at mediation	26.00
Total Disbursements		\$570.25

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**Outstanding AR Summary**

<b>Date</b>	<b>Invoice Number</b>	<b>Amount</b>	<b>Payments</b>	<b>Balance</b>
09/12/24	43586075	\$46,521.04	\$44,729.54	\$1,791.50
11/25/24	43601813	\$11,882.00	\$0.00	\$11,882.00
03/20/25	43624095	\$16,390.50	\$0.00	\$16,390.50
04/21/25	43630014	\$19,606.75	\$0.00	\$19,606.75
<b>Total Balance:</b>				<b>\$49,670.75</b>

AR Balance:

0-30	31-60	61-90	91+	Total
\$19,606.75	\$16,390.50	\$0.00	\$13,673.50	\$49,670.75

Questions or concerns, please call 800-846-1201 or email [payments@stinson.com](mailto:payments@stinson.com)